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May 6, 2022

*Via ECF*

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
40 Foley Square  
New York, NY 10007

*Re: Iris Jimenez v. Bogoto Realty Inc., et al., No. 21-cv-9664 (LGS)(SLC)*

Dear Judge Schofield:

We represent the plaintiff in the above-entitled action. We write to advise the Court that plaintiff intends to respond to defendants Bogoto Realty, Inc.'s. ("Bogoto") and Farview, Inc.'s ("Farview") current letter (ECF Docket # 59), and respectfully requests the Court to allow plaintiff the opportunity to submit a response on or before Monday, May 9, 2022, before issuing a determination. In the alternative plaintiff respectfully requests that the Court Order defendants Bogoto and Farview, to meet and confer in good faith<sup>1</sup> with plaintiff regarding their current discovery dispute, and should the dispute not be resolved, permit plaintiff to file her response within two (2) business days thereafter.

Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/

Robert G. Hanski, Esq.

The Court has reviewed the letters docketed as Dkt. No. 59 and Dkt. No. 61. The Court is not convinced that sufficient communications have taken place between counsel. Thus, all requests for relief in these letters are **DENIED without prejudice**.

By **May 13, 2022**, the parties shall meet and confer in good faith in an effort to resolve the dispute. In the event that a pre-motion letter is still warranted, by **May 17, 2022**, the parties shall file any such letter in accordance with the Court's Individual Rule III.C.3, with any response due by **May 23, 2022**.

The Clerk of Court is respectfully directed to close the motions at Dkt. No. 59 and 61.

Dated: **May 9, 2022**  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

<sup>1</sup> As per this Court's Individual Rules and Procedures for Civil Cases at III.c.3.